

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

BEDFORD, FREEMAN & WORTH  
PUBLISHING GROUP, LLC d/b/a  
MACMILLAN LEARNING, *et al.*,

Plaintiffs,

v.

SHOPIFY INC., *et al.*,

Defendant.

Case No. 1:21-cv-01340-CMH-JFA

**NOTICE OF PLAINTIFFS' SUBMISSION OF AMENDED EXHIBIT A TO COMPLAINT**

Plaintiffs Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning, Cengage Learning, Inc., Elsevier B.V., Elsevier Inc., Macmillan Holdings, LLC, McGraw Hill LLC, and Pearson Education, Inc. (collectively, "Plaintiffs"), by and through their undersigned counsel, hereby submit an amended Exhibit A to their Complaint, in accordance with the Court's Scheduling Order. Proposed Modified Joint Proposed Plan Pursuant to Rule 26(f) at 5-6 (setting deadline to amend Exhibit A to Complaint as of right), ECF No. 45; Rule 16(B) Scheduling Order at 1 (approving Joint Discovery Plan), ECF No. 46. The amended Exhibit A to the Complaint is attached hereto. This submission is without prejudice to Plaintiffs' right to further amend Exhibit A.

Dated: May 2, 2022

Respectfully submitted,

/s/ Scott A. Zebrak

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